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VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

This firm is counsel to defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff (“Wolff”), Entangled Publishing, LLC (“Entangled Publishing”), Holtzbrinck Publishers, LLC d/b/a Macmillan (“Macmillan”), and Universal City Studios LLC (“Universal” and collectively, “Entangled”). We write together with counsel for defendants Emily Sylvan Kim (“Kim”) and Prospect Agency, LLC (collectively, “Prospect,” and collectively with Entangled, “Defendants”).

In accordance with Rule 21.7 of the Electronic Case Filing Rules & Instructions of the United States District Court of the Southern District of New York, Defendants respectfully request Your Honor’s approval to formally seal Defendants’ December 5 Letter Motion in response to Plaintiff’s December 1 email (“Letter”) (ECF No. 78), in an effort to address Mr. Passin’s confidentiality concerns regarding a reference to Plaintiff’s medical condition. Entangled further requests that Exhibit C to the Letter, which consists of Wolff, Entangled Publishing, and Macmillan’s revised responses to Plaintiff’s interrogatories, be formally sealed because it includes highly sensitive proprietary financial information relating to revenues and expenses earned by these defendants in connection with the *Crave* series. These documents have been temporarily sealed by the ECF Help Desk. In accordance with Rule 21.7(c) the redacted versions of the Letter and Exhibit C will be re-filed.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Benjamin S. Halperin

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Cc: All counsel of record (via ECF)